#### **PETITION**

NOV 13 2012

FCC Mail Room

From The

Co-op Members and Customers of Chariton Valley Telephone Corporation
To

FCC Chairman Julius Genachowski

Name **Address** 16028 Chestont the Salisbury Mosse 2356) Greenound St Bevier, MO 63532 31231 Marshall Rd Jacksonville 65260 405 Broadway Macon, Tho 63552 DIL Manor DR Solisbury No 65281 SALISBURY MO 65281 308 MINT Solisbury mo

#### **PETITION**

FCC Mail Room

From The

Co-op Members and Customers of Chariton Valley Telephone Corporation

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Name	Address
Steve William	Jacksonville, Mo
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Wanda Mathis	Cairo Mo
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Deed Houden	Sand Salisty Mo
Reberch Middle brooks	Salisbury, Mo.
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Vitte hombell	Maron, no
Derry Kelley	Salisbury Mo
John Samptel	HALE, MO.
~ /	New Bostos, Mo
Judy Schrick hese	Clifton Will mo
Ruth aun washam	Salislurg, mo.
Sollie Red	Salislurg, Mo. Moberly no

#### **PETITION**

FCC Mail Room

From The

Co-op Members and Customers of Chariton Valley Telephone Corporation

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Name	Address
Irene Wyatt	35197 St Haye MAron
Manda Hyst	Bevir, no.
Diana Adas	Bener 40
Patty Cheever	Beine, Tho.
Cerdy Lucas	Excello, MO 65247
Seen Dunwint	Salisbury
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Bish Locker	Solidery
Wm Sligh	Benice
HollyWooldridge	Huntsuille, MO 65259
Billy Mott	Dalubury mo 652 91
Harry Vassa	
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#### **PETITION**

FCC Mail Room

From The

Co-op Members and Customers of Chariton Valley Telephone Corporation

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Name	Address
Dawntorles	28606 Walton Due Salisberry
Horrey Porter	28606 WALTON AUE Salistry
Randall Wation	24092 Garden & Bevier Tro43532
Walna Joanhin	Solily MDD
Wanka Jayla	Salislay Mo. 65281
Leville Wright	Solislaughe 65281
Judy Minkle	34909 Baleskuy
Hildred abelo	301 D. Grand Dalesbury MOSER
Delie Turnan	21/24 Heyf Salsky My
" The bolde	1008 Whiting Lyterolly MO
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Jamn Henke	601 S. Birch Salishury
Sonise Crutchfield	Huntbolle
Thurlow Schauffler	1970 County Road 2210 Huntries
Floyd Tunenar	1970 County Road 2210 Huntsiel 31379 Stonewall Ave Solesbury Mo

FCC Mail Room

#### **PETITION**

From The

Co-op Members and Customers of Chariton Valley Telephone Corporation

То

Name / //	Address
Jang Selebrur	HUNTSULLY
Caryl Brown	Keytesville
Judy Welister	Cleto Hill
Award Marson	Salahuj
Jaurel Genoman	Bucklin
James Han 111	26324 Magle De Kuflin 64131
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Jan Wechaelin	Cairo Me
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Dazel Engel	Dlasgow Mo-
Anna J. Laines	1953 6 Rd 1170 Huntsville M
Rorald K. Sainer	1953 C Rd 1170-Huntsville, Mo
Sam Harlar	
Callie Wolwton	Lentouela Mo.

#### PETITION

NOV 13 2012

FCC Mail Room

From The

Co-op Members and Customers of Chariton Valley Telephone Corporation
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Name	Address
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Tim Suiklarf	Salesher
Herry Henke	Selstring
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#### **PETITION**

FCC Mail Room

From The

Co-op Members and Customers of Chariton Valley Telephone Corporation
To

FCC Chairman Julius Genachowski

**Address** Name 36518 Elm Real Salesy Mb 65881 Blu Solislusy Mo Masulle, No 65259 St. Bushlen mo 64631

#### **PETITION**

FCC Mail Room

From The

Co-op Members and Customers of Chariton Valley Telephone Corporation

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Name	Address
EllhKolder	Huntalle
neli Paul	Salishers Md
M.R. Sewis	Cliffon Hill MO
	Clotton Hely MO
Mary Willeams Geberra Emmerich	Talisbury MD
Steven Truessel	Salisten Mo.
Low Kitchess	Buckles On
Listiney	Budlin Mo.
Southanson	Brecklin No.
Mak Conny	Sulisbury Mo
Ida Sentiena	Glasgow mo
Ralph Living Stor	Bevier MO.
Lane Walace	New Boston mo.
Wesley C. Weiner	Salisbury Mo
Opal L. Spence	Salisbary, Mo.

#### FCC Mail Room

#### **PETITION**

From The

Co-op Members and Customers of Chariton Valley Telephone Corporation

То

Name	Address
Dale Hudricker	Clifton Hell, Mo.
Dale Andricker Little Kintinde	thinksulle, no
Stal Boumann	Henterell, Mo
Chris Bran	Salisbury Mo.
Wilma Fauts	Salisbury Mo.
Shuly Buggere	Salisbury Mo
Dondo C Try Willet	PALE MI
Kenneth Fants	Salisburg, Wor.
Robert W. Kelsan	Salisbury, Mo
Apthryn Milner	New Boston MO
Elsie & Rophins	At Pakinso
Paty Moeliel	Carry
Marlene Mathis	Cairo
Aicia Stockman	Salslury
Kay Watson.	Bevier

#### FCC Mail Room

#### **PETITION**

From The

Co-op Members and Customers of Chariton Valley Telephone Corporation

To

FCC Chairman Julius Genachowski

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Dous Ketchen

Address

27487 LOUGBRANCHLAKE MACON MO

#### **PETITION**

FCC Mail Room

From The

Co-op Members and Customers of Chariton Valley Telephone Corporation

То

Name	Address
Vicky Faulter	313 East 4th Salesburg mo
Thurlow Schauffler	1970 County Road 2210 Huntson
Warren Ross	15688 Huy 129 Salisbury No
Alabeth Wright	39257 Organ D. Excella Mo
Dive Mouter	
Mill A. Uglin	31607 state Hay C Bavian, No 63
Mary almond	17136 Hwy 129 New Boston, M
Col Voth	1404 Coval 1815 CAIRO NO 6355
Jeletz Dtonen	D5 N. Blevins Dr. Sulsburgth 65281
Turstarm	Salish
Setty Harman	Salisbury
Shirly Black	Bucklin mo
HARLEY FUNK	HUNTSVILLE MO
CHARLA FUNK	HUNTSUILLE MO

#### **PETITION**

FCC Mail Room

From The

Co-op Members and Customers of Chariton Valley Telephone Corporation

То

Name	Address
Pourie Mit Shavey	Collab Ma
Betty BShith	Berriagno
Hern Monnay	1231 Marsa De Sahrbury Mo 65281
Thich Serfass	34302 State Hwy 3 Callas, MO 65534
Cutolita	36808 MCDONALD
Cathy Sports.	30007 Hwy 129-Shalishung M
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ady Basi	Selectory Rosa
Linda Red	7193 Hwy BB Huntswille Mub
Johnnie & Douetta	, ,
Box Deakerwood	Salisbury
Lors Boll Chiser	Sales Guy Mo 65281
Elvi moner	Bucklin, mo 64631
Ellewtenn	Man Cambria, Mo 63558
Daris Lower Lower	Lentwille, Mo 69209
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#### FCC Mail Room

#### **PETITION**

From The

Co-op Members and Customers of Chariton Valley Telephone Corporation

То

Name	Address
Ederyl Go Song.	3963/US Hory 63, Socksmudle Mo 65260
Rieby Jenrol	18585 Glesaue Salisland,
Sharon Clavers	Cotts & Broadway Salisburg
Ala Lenneman	4442 Clifton Hei mo 652411
Raymond Hughes	P.O. Box 174 Bucklin nons.
Linda Sandus	32571 French Rd Glasgow Mo.
Jayre Sevallan	117 Melody Lave Salisbury, me
fan Freto	117 Meloder Jane Salesbury, Mc 36518 Elm Road Sol. Day Mc65281
Jung Spunger	39057 Hny 24 Salistung Mos
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Williams Wish	4706 HUYF CLIFTON Hu Mo 65244
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Klllin	407 PINE ST BUCKLIN MO.

#### **PETITION**

NOV 13 2012

FCC Mail Room

From The

Co-op Members and Customers of Chariton Valley Telephone Corporation

То

Name	Address
Lavel Shuse	300Pine St. Bucklin Mo
Dong Farmer	405 5 LEFEVEE SALISBURY MO
Jos Wood	15258 Hwy Z New Cambria, MO
In wood	15258 Hary Z New Cambria, MO
(noushallbeferreider	33920 Selem Ave Salisbury mo
Harold Shatto	12127 CR. 355 Hale 710 64643
Sarah Greev	105 w. 3rd. Bucklin mo 64631
Scott Staffet	501 N. Blevins Mo 65281
Betty Wills	210 Dentry Bucklen, Mo (4131
Nanda Voyles	15808 Lug 129 New Beston Mrs 6353

#### FCC Mail Room

#### **PETITION**

From The Co-op Members and Customers of Chariton Valley Telephone Corporation

То

Name	Address
John Bally	603 E South Dr, SALisburg, Mo
In any	615 W. Dexat Huntrule, Mo
Pat malans	688 Harlan St. Clifton Hill, Mo
Rose Eberhard	1421 CR 1780 Cano MO
Mark Jorkand	1421 CR 1780 Conero/ MC
Jeanne Frynsk	33898 St Hmy FF, Benev Mo
Shari Barwa	404 W. 13th St., Salistury, mo

#### **PETITION**

FCC Mail Room

From The

Co-op Members and Customers of Chariton Valley Telephone Corporation

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Name	Address
Jasen Sulkay	214 East Howell Marceline MO 64658
Rich Standley	24600 Huy 129 Bucklin, Mo. 64631
S. S.	520 Johnson bluttoulle no
(Inthony March	Sdisling mi 65 cst
Dorothy M. Kertz	1295 Huntsville, MO 6525
Love & young	615 W. Pepat Huntsulle m 652
Dina Waller	30960 St. Huy. T Excelle MO 6524
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Gryg Barrer	404 W. 134 St. Salisbary, MOG5281
Row Thomean.	34692 Hwy T- Salisbury 6528
Martin Hafemeister	34131 Salem An Salisburg M 65281

Received & Inspected

NOV 13 2012

#### **PETITION**

FCC Mail Room

From The

Co-op Members and Customers of Chariton Valley Telephone Corporation

To

Name	Address
Edinia escett	2154 County RD. 2610 moleculy, mo.
annfarlan	2154 County RD. 2610 moleculy, mo. 6527
throld Walter	10795 Jacksounth Mo (5240
Storge R. Coureton	305/0 St Hwy T, Exce 10,652/1
Ronnell Court	30510 St. Levy T. Excello, mo. 65247
Kerry Spais	1578 Co Rd 1235 Huntsv: 1k, mo
Diane Wale,	2595 Ay Rd 2315 Moberly 140 65270
ynda Mitanzie	1913 Eastbrook G. Moberly. Mo

#### **PETITION**

FCC Mail Room

From The

Co-op Members and Customers of Chariton Valley Telephone Corporation

To

FCC Chairman Julius Genachowski

Name

Address

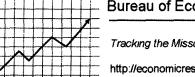
42) brand Ave Huntsville, MO65259 1245 Moberly, MO 65270 515 South alt Moberly, MO 65270 39153 Folcon Rd New Combria 63558 1303 Buelanger Moperty 65270 245 mobery mo 105020 816 N. Sturgeon Carro mo 65239



phone ◆ internet ◆ cable tv ◆ wireless

## Economic Impact of Reductions in Universal Service Fund and Intercarrier Compensation Revenues to Chariton Valley Telephone Corporation

Contact: Dr. David M. Mitchell, Director Bureau of Economic Research Missouri State University Springfield, Missouri 65897 (417) 836-5551



#### **Bureau of Economic Research**

Tracking the Missouri economy since 1971

http://economicresearch.missouristate.edu phone: (417) 836-5551 fax: (417) 836-4236

### The Impact of the Federal Communications Commission Reform of Universal Service Funding and Inter-Carrier Compensation on Chariton Valley Telephone Corporation

Chariton Valley Telephone Corporation, a member owned cooperative, with headquarters in Macon, Missouri, has a 60 year history of providing leading edge telecommunication service in north central Missouri. Chariton Valley's portfolio of services include wireline and wireless voice and broadband services, as well as analog video and IPTV with fiber-to-the-premise service connections to over 55% of its customer base. Chariton Valley was an early adopter of IP technology using IP network technology for it 300+ mile transport ring and fiber-to-the-premise service beginning in 2003. Chariton Valley Telephone's competitive local exchange carrier (CLEC) subsidiary, Chariton Valley Telecom Corporation, was the first company in Missouri to use an IP fiber-to-the-premise network to overbuild of an incumbent local exchange carrier (ILEC).

Chariton Valley's forward looking service plans include the continued building of advanced broadband services to all its customer base until the Federal Communications Commission's November 2011 Order directing Universal Service Fund (USF) and Inter-Carrier Compensation (ICC) reform was released. Analysis of the FCC's reform of USF and ICC indicates there will be substantial reductions in Chariton Valley Telephone's USF support. USF support to competitive eligible telecommunications carriers (CETCs) such as Chariton Valley Wireless Services will be completely eliminated over five years. The reform calls for reductions in the amount of terminating ICC received by Chariton Valley Telephone Corporation and its CLEC subsidiary Chariton Valley Telecom. Terminating ICC will be reduced to "bill and keep" or \$0 in nine years for Chariton Valley Telephone and five years for Chariton Valley Telecom. The FCC's reform order calls for the implementation of benchmark rates and an Access Recovery Charge or ARC, causing local service rates to increase in an area that has not yet recovered from the recession.

Chariton Valley implemented an increase in local service rates and the ARC, and reduced terminating access rate in July 2012, per the FCC's reform order. On June 1, 2012, Chariton Valley mailed its customers a letter announcing the local service rate increase and implementation of the ARC. Since the letter was mailed, Chariton Valley has experienced an increase of 38.46% in the trended rate of disconnected local service (voice) by its customers in June and July compared to the prior six months. Broadband services moved from month over month historical growth to the first decline in broadband customers in over five years. This is contrary to the FCC's expectation that reform would have little negative impact on rural telecommunications providers, and contrary to the FCC's intent to increase broadband subscription.

The FCC's reform of USF and ICC has created "uncertainty" as to the future financial viability of Chariton Valley. This uncertainty has caused Chariton Valley to stop further deployment of fiber-to-the-premise in the Chariton Valley Telephone Corporation service area. Chariton Valley's CLEC, Chariton Valley Telecom, does not receive USF support, but does rely on ICC to

#### Chariton Valley Telephone Corporation A Leader in Telecommunication Services

Chariton Valley, like many rural telephone companies, came into being following the 1949 passage of the Telephone Amendment to the Rural Electrification Act. The concept of "universal service" became firmly entrenched as the law of the land. This cornerstone of national social policy was meant to ensure that all Americans, regardless of where they live, receive quality telephone service at reasonable rates. The first meetings that led to the formation of Chariton Valley were held in January, 1950. On November 22, 1952 the Missouri Secretary of State authorized the cooperative to do business as Chariton Valley Telephone Corporation. The new company established it headquarters in office space rented from Macon Electric Cooperative in Macon, Missouri.

In 1954 the Board of Directors voted to move the headquarters from Macon to rented offices in Bucklin. Chariton Valley's phenomenal growth soon resulted in the Bucklin office becoming too small and the Board agreed to construct a new headquarters and warehouse on the northeast edge of Bucklin. Later, the Board voted to build customer service centers in Huntsville and Salisbury and a central switching office was also constructed in Huntsville.

Chariton Valley started with three exchanges that included Bynumville, Bucklin and Ethel. The commitment to cutting edge technology became a Chariton Valley standard when all three exchanges were converted to dial service in 1956. Operations were expanded to eventually include today's 18 exchanges. From its obscure beginnings as a rural telephone cooperative Chariton Valley has evolved into a state of the art communications provider whose services are second to none. Our record speaks louder than words:

**1963:** By the end of 1963 all 18 Chariton Valley exchanges were converted to dial service. Much of the country was still years behind.

**1977:** Chariton Valley became the first multi-exchange telephone company in Missouri to have a complete one party system. No more party lines!

**1983:** Chariton Valley Communications Corporation was created to provide cable TV service in Bevier, Bucklin, Callao and Excello.

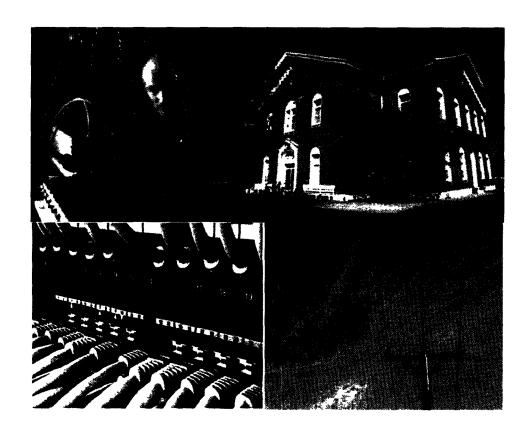
**1989:** CV Cellular, now Chariton Valley Wireless Services, was established to provide wireless service.

**1995:** Chariton Valley Telephone was the first to provide local Internet access with its dial up Internet service. A new digital switching system made it possible to offer the latest up-to-date communications services, including Caller ID and Call Waiting.

Chariton Valley constructed a new corporate office in Macon at a cost of \$1,700,000 and a Data Center/Network Operations Center in 2009 in Huntsville at an additional cost of \$1,400,000. None of Chariton Valley's investments were offset with tax incentives or subsidies.

At Chariton Valley we realize that any investment in the future of this area must include our young people. Each year our employees visit area schools to teach 3<sup>rd</sup> grade students how to effectively use the 9-1-1 system to report emergencies. During the last five years 2,895 students have received the training. We also award five \$500 college scholarships each year and sponsor one student on an all-expenses paid trip to Washington, DC. Plus, CVTV makes its cameras and equipment available to area schools and we frequently air student produced programming on our local content channel. In doing so, we not only provide opportunities for students to learn about videography, but to also create a video record of events that are important in their lives.

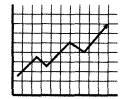
Why do we do it? Chariton Valley – and its employees – support local communities because they are our communities too. We live here, shop here, worship here, and send our children to school here. Our past and our future are intertwined with our customers and we hope that it is profitable for all concerned.



# Economic Impact of Reductions in Universal Service Fund and Intercarrier Compensation Revenues to Chariton Valley Telephone Corporation

Contact: Dr. David M. Mitchell, Director Bureau of Economic Research Missouri State University Springfield, Missouri 65897 (417) 836-5551





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### Economic Impact of Reductions in Universal Service Fund and Intercarrier Compensation Revenues to Chariton Valley Telephone Corporation Executive Summary

The Federal Communications Commission (FCC) has ordered changes to the Universal Service Fund (USF) program and to interstate and intrastate Intercarrier Compensation (ICC) systems. The USF was established to ensure telecommunications consumers in rural high-cost areas would have access to telecommunications and information services comparable in quality and price to those available in urban areas. The USF program accomplishes this by providing support to the higher cost of providing communications networks in rural areas.

Prior to the FCC Order, interstate and intrastate Intercarrier Compensation (ICC) has also been designed to provide support to higher cost rural network providers. Rural networks are more expensive per customer to build, maintain, operate and expand than are urban networks. As there is less customer density in rural areas there is also less network usage with which to recover those costs. ICC allowed the rural network provider to charge other companies for using their rural networks to originate and terminate calls in rural areas. Like USF, ICC was designed to provide financial support to rural network providers so that rural customers would have rates and services comparable to those of more urban customers.

Chariton Valley Telephone Corporation (CVTC) operates in rural north-central Missouri. CVC relies heavily upon USF and ICC, which provide over half of its total operating revenues. CVTC provides wireline and wireless telecommunication services, as well as broadband access and television services to rural areas that, when compared to the rest of the country, are predominately poorer and have lower population densities.

Reducing USF and ICC revenues to Chariton Valley, as ordered by the FCC, was studied to determine its impact upon the statewide economy. The economic impacts of these decreased revenues to CVTC will multiply throughout the economy. Over the next several years, output in Missouri will decline between \$34 and \$41 million depending upon policy decisions the FCC has deferred to the future. Employment would diminish by betweem 155 to 187 jobs, with wages declining by between \$9 million to \$11 million during the 2012 to 2020 period. This diminished economic activity will lead to smaller tax revenues. Federal tax revenues will fall by \$2.05 to \$2.45 million. State and local tax revenues would decline by \$2 to nearly \$2.4 million.

These negative impacts to the Missouri economy will result from these revenue reductions to one firm, CVTC. A more thorough analysis should consider the impact of these revenue reductions to other communications firms providing similar services to rural areas of Missouri.

**1996:** CVLD Corporation was created to offer long distance service, voice mail, calling cards and 800# services.

**2002:** SpeedNet was deployed and offered Internet high-speed connectivity that was 14 times faster than what had previously been available. Chariton Valley began exploring the possibility of building a fiber-to-the-home network in Macon. Construction of FTTH in Macon started that Fall.

**2003:** Chariton Valley's corporate office was relocated back to Macon. The FTTH project was completed in Macon and customers started signing up for the triple play option of voice, video and data services on Missouri's first fiber-to-the-home network.

**2005:** Chariton Valley began expanding its fiber-to-the-home network to include Bevier, Callao, New Cambria and Bucklin.

**2006:** A new corporate logo was introduced that reinforced CV's commitment to quality communication service and personal customer service. A new corporate headquarters was constructed in Macon.

**2008:** CVTV, Chariton Valley's local content IPTV channel, went on the air to approximately 3,000 households.

**2009:** Chariton Valley constructed a state of the art Network Operations Center in Huntsville.

**2010:** By year's end Chariton Valley demonstrated its commitment to providing the best wireless coverage in its five county home area by doubling the number of cell towers.

**2012:** Chariton Valley launched its new CDMA network with 3G EVDO high speed data service; partnered with Verizon on the LTE in Rural America project; and is progressively working towards a 4G-LTE network. Computer repair was added to the growing list of services provided by Chariton Valley and the fiber-to-the-home network has expanded to fifteen towns, making the fiber service available to over 55% of Chariton Valley Telephone customers.

Chariton Valley's record of success is equaled only by its history of involvement in and support of the communities it serves. We are a frequent contributor, in terms of both money and time, to community events, fundraisers and organizations. CVTV regularly promotes upcoming events at no cost to the sponsoring organization. More significantly, the conversion to fiber optic cable is a costly yet necessary investment if our communities are to remain economically viable. Chariton Valley has developed a state of the art communications system that features fiber optic cable by invested nearly \$24,600,000 in the community of Macon and surrounding area as well as in our five county service area including the communities of Bevier, Callao, New Cambria, Bucklin, Salisbury, Hale, Ethel, Prairie Hill, Jacksonville, and Excello. Moreover, in 2006

support its network. As the result of phase down of terminating ICC to \$0, Chariton Valley Telecom's network expansion plans are greatly diminished. Some portions of the reform order have not yet been completed, causing further uncertainty and consternation. Rural consumers are penalized as the result of rural telecommunication service provider's decisions to stop deployment of broadband services due to the uncertainty brought about by the FCC's reform order.

Due to the projected impacts of the FCC's USF and ICC reforms on Chariton Valley and its subsidiary companies, Chariton Valley commissioned Dr. David M. Mitchell, Director of the Bureau of Economic Research at Missouri State University, Springfield, Missouri to prepare an impact study to Chariton Valley. The study titled <a href="Economic Impact of Reductions in Universal Service Fund and Intercarrier Compensation Revenues to Chariton Valley Telephone Corporation.">Economic Impact of Reductions in Universal Service Fund and Intercarrier Compensation Revenues to Chariton Valley Telephone Corporation.</a>

The impact study demonstrates that the negative effects of the FCC's USF and ICC reform reach beyond the immediate Chariton Valley service area, and will multiply throughout the economy, affecting jobs, wages and cause diminished economic activity leading to smaller tax revenues at the local, state and federal level.

We at Chariton Valley do not believe that it was the FCC's intent to cause harm to rural telecommunication service providers and rural consumers. But the FCC got it wrong, and efforts to convince the FCC that its reform methods are harmful have fallen on "deaf ears." Rural consumers need the help of their local, state and federal representatives to correct this wrong. The university's impact study shows the negative effects are far reaching. Time is short. It is important that rural consumers, as well as local, state and federal representatives, act now. Rural consumers need to encourage their representatives to contact FCC Chairman Julius Genachowski and remind him that the first rule of reform is to do no harm. The FCC staff should follow the advice of state regulators, who understand their communities far better than the regulators in Washington, D.C., and suspend implementation of reform measures that drastically cut support to rural telecommunications providers and rural consumers. Reform is needed, but it should proceed deliberately in a way that ensures that USF support is predictable; that reforms will be implemented in a way to encourage additional private investment in broadband deployment; and that the goal of promoting economic growth and job creation in rural communities can be realized.